WHITMOYER LABORATORIES OU1 ADMINISTRATIVE RECORD FILE * INDEX OF DOCUMENTS

I. <u>SITE IDENTIFICATION</u>

- U.S. EPA Potential Hazardous Waste Site Identification and Preliminary Assessment, 12/23/83. P. 100001-100004.
- 2. U.S. EPA Potential Hazardous Waste Site, Site Inspection Report, 4/11/84. P. 100005-100011.

^{*} Administrative Record File available 6/16/89, updated 3/7/94, 5/17/00.

II. REMEDIAL ENFORCEMENT PLANNING

- Letter to Mr. Jan F. Horwath, Buckeye Pipe Line Company, from Mr. Thomas C. Voltaggio, U.S. EPA, re: 104(e) request for information, 4/14/89. P. 200001-200005. A certified mail receipt is attached.
- 2. Letter to Mr. Harold Bogatz, Myerwhit Land Corporation, from Mr. Thomas C. Voltaggio, U.S. EPA, re: 104(e) request for information, 4/14/89. P. 200006-200010. A certified mail receipt is attached.
- 3. Letter to Beecham Labs, from Mr. Thomas C. Voltaggio, U.S. EPA, re: 104(e) request for information, 4/14/89. P. 200011-200015. A certified mail receipt is attached.
- 4. Letter to Mr. Frank A. Lucero, Stafford Laboratories, from Mr. Thomas C. Voltaggio, U.S. EPA, re: 104(e) request for information, 4/14/89. P. 200016-200020. Two certified mail receipts are attached.
- 5. Letter to Ms. Ellen Friedell, Rohm & Haas Company, from Mr. Thomas C. Voltaggio, U.S. EPA, re: 104(e) request for information, 4/14/89. P. 200021-200025. A certified mail receipt is attached.
- 6. Letter to Mr. C.W. Whitmoyer from Mr. Thomas C. Voltaggio, U.S. EPA, re: 104(e) request for information, 4/14/89. P. 200026-200030. A certified mail receipt is attached.
- 7. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Mr. Harold Bogatz, Meyerwhit Land Corporation, re: Response to the 104(e) inquiry, 4/25/89. P. 200031-200031.

III. REMEDIAL RESPONSE PLANNING

- 1. Fact Sheet, re: Arsanilic Acid Startup Fact Sheet, 5/10/77, P. 300001-300005.
- Memorandum to Mr. R.L. Widerkehr from Mr. Harold M. Huffman, Whitmoyer Laboratories, Inc., re: Transmittal of information on arsenical waste disposal, 7/21/80. P. 300006-300021. A summary report entitled "Arsenical Waste Disposal" is attached.
- Memorandum to D.E. Courtney, R.D. Frawley, G.D. Hoover, H.M. Huffman, D.J. King, T.E. Long, H.W. Mann, L.P. Olon, K.H. Ream, R.S. Rosera, F.L. Shaak, E.H. Treat, and G. Werner from Mr. Lloyd J. Croesus, Whitmoyer Laboratories, Inc., re: Notification of hazardous waste activity, 8/11/80. P. 300022-300023.
- 4. Letter to Mr. Donald Wanamaker, Lion Technology, from Mr. Lloyd J. Croesus, Whitmoyer Laboratories, Inc., re: Explanation of the use of a fiberglass tank, 8/27/81. P. 300024-300024.
- 5. Letter to Mr. Lawrence P. Gemmell, Gem-Chem Chemical Management Company, from Mr. Lloyd J. Croesus, Whitmoyer Laboratories, Inc., re: Transmittal of an aniline water stream data sheet, 9/28/82. P. 300025-300030. The aniline water stream data is attached.
- 6. Material Safety Data Sheet for emulsified cresylic acid solution, prepared by Whitmoyer Laboratories, Inc., 12/21/82. P. 300031-300032.
- 7. Memorandum to Mr. W.H. Skinner from Mr. L.J. Croesus, Whitmoyer Laboratories, Inc., re: Expense projection for November and December 1983, 11/10/83. P. 300033-300033.
- 8. Memorandum to Mr. H.M. Huffman, Mr. W.H. Mann, Ms. K.L. Sell, Mr. W.H. Skinner, and Mr. J.C. Ziegler from Mr. Lloyd Croesus, Whitmoyer Laboratories, Inc., re: Problems with a November 10, 1983

shipment of arsenical wastewater, 11/11/83. P. 300034-300034.

- 9. Memorandum to Mr. H.M. Huffman, Mr. W.H. Mann, Ms. K.L. Sell, Mr. W.H. Skinner, and Mr. J.C. Ziegler from Mr. Lloyd Croesus, Whitmoyer Laboratories, Inc., re: Analytical values of the November 10, 1983 shipment of arsenical wastewater, 11/15/83. P. 300035-300036.
- 10. Analytical Laboratory Request and Report Form for Waste from 8108 Tanker, 11/2/83. P. 300037-300037.
- 11. Memorandum to Regional file from Mr. Timothy Alexander, Pennsylvania Department of Environmental Resources (PADER), re: Site history information, 12/29/83. P. 300038-300039.
- 12. Letter to Mr. Krishnan Ramamurthy, PADER, from Mr. Lloyd Croesus, Whitmoyer Laboratories, Inc., re: Proposed material balance for manufacture of chlorhexidine, 1/18/84. P. 300040-300044.
- 13. Analytical Laboratory Request and Report Form for Study and Liquid from T-R, 2/14/84. P. 300045-300045.
- 14. Memorandum to Mr. F.A. Lucero from Mr. A.C. Smith, re: Phenol residue inventory, 10/10/84. P. 300046-300046.
- 15. Report: Revised Closure Plan, Whitmoyer
 Laboratories, Inc., 99 South Fairlane Avenue,
 Myerstown, Pennsylvania, 17067, prepared by
 Whitmoyer Laboratories, Inc., 4/15/85. P. 300047-300082. A transmittal letter is attached.
- 16. Letter to Mr. Stephen R. Wassersug, U.S. EPA, from Mr. Arnold C. Smith, Whitmoyer Laboratories, Inc., re: Transmittal of a topographic map, a site map, and a list of SWMU's, 9/23/85. P. 300083-300089. A Certification Statement, topographic map, and a site map are attached.

- 17. Memorandum to Mr. F.A. Lucero from Mr. A.C. Smith, Whitmoyer Laboratories, Inc., re: Six Month Plan for the removal of hazardous waste, 10/31/85. P. 300090-300090.
- 18. Telephone conversation record of Mr. D. Brayack, NUS Corporation, with Mr. Dave Fantasia, Waste Conversion, re: Questions about P and F wastes, 3/9/86.
 P. 300091-300091.
- 19. Site Visit Notes of Mr. John Trepanowski, NUS Corporation, re: Visit with Mr. Kirst to observe tanks and the plant, 1/12/88. P. 300092-300092.
- 20. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Mr. Arnold C. Smith, re: Description of the site as Mr. Smith last remembered it, 3/21/88. P. 300093-300093.
- 21. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Ms. Kathy Marino, Rollins, re: Information for waste incineration purposes, 5/23/88. P. 300094-300094.
- 22. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Mr. Bruce Marti, SCA, re: SCA's requirement for a waste profile, 5/23/88. P. 300095-300095.
- 23. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Mr. Mike Camfield, CECOS Landfill, re: Information needed by CECOS to accept wastes, 5/23/88. P. 300096-300096.
- 24. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Mr. Jim Callahan, Chemical Waste Management, re: Information needed for the Model City location to accept wastes, 5/23/88. P. 300097-3000097.
- 25. Report: Final Work Plan, Whitmoyer Laboratories Site, Jackson Township, Lebanon County,
 Pennsylvania, prepared by EBASCO Services, Inc.,
 6/10/88. P. 300098-300387.

- 26. Report: Final Field Operations Plan, Whitmoyer
 Laboratories Site, Jackson Township, Lebanon County,
 Pennsylvania, prepared by EBASCO Services, Inc.,
 6/10/88. P. 300388-300732.
- 27. Letter to Mr. John Trepanowski, NUS Corporation, from Mr. Kirk A. Stemple, Chemical Waste Management, Inc., re: Transmittal of Waste Material Profile Sheets. 6/20/88. P. 300733-300742. Waste Material Profile Sheets for arsanilic, carbarsone, and aniline are attached.
- 28. Site Visit Notes of Mr. John Trepanowski, NUS Corporation, re: Contents of tanks at the site, 7/19/88. P. 300743-300743
- 29. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Mr. Jeff Pike, U.S. EPA, re: No further need for piping sampling, 8/24/88. P. 300744-300744.
- 30. Site Visit Notes of Mr. John Trepanowski, NUS Corporation, re: Concerns about the contents of tanks at the site, 9/27/88. P. 300745-300745.
- 31. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Mr. Jeff Pike, U.S. EPA, re: Request for a product inventory and aniline storage transfer, 9/28/88. P. 300746-300746.
- 32. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Mr. Ken Sirmarco, Delaware Container Company, re: Analysis of wastes, 10/13/88. P. 300747-300747.
- 33. Report: Preliminary Health Assessment of Whitmoyer Laboratories, Jackson Township, Lebanon County Pennsylvania, prepared by Agency for Toxic Substances and Disease Registry (ATSDR), 11/17/88. P. 300748-300752.
- 34. Telephone conversation record of Mr. John
 Trepanowski, NUS Corporation, with Mr. Walter Mock,
 Betz Entec, re: Contents of the drums in Building 9,
 2/3/89.
 P. 300753-300753.

- 35. Letter to Mr. John Trepanowski, NUS Corporation, from Betz Entec, Inc., re: Material Safety Data Sheets, 2/3/89. P. 300754-300757. The data sheets are attached.
- 36. Telephone conversation record of Mr. David Brayack, NUS Corporation, with Mr. Rich Fuller, Rollins, re: Incineration of 5,000 gallons of liquid, 2/8/89.
 P. 300758-300758.
- 37. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Mr. Pat McManus and Mr. Jeff Pike, U.S. EPA, re: Discussion of waste origins to determine if they are listed or characteristic wastes, 3/1/89. P. 300759-300760.
- 38. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Mr. Pat McManus and Mr. Jeff Pike, U.S. EPA, re: Status of the liquid in Tank 7, 3/1/89. P. 300761-300763. A letter dated March 1, 1989 regarding waste origins is attached.
- 39. Telephone conversation record of Mr. John Trepanowski, NUS Corporation, with Mr. Pat McManus, U.S. EPA, re: Guidance for the treatment of groundwater wastes, 3/10/89. P. 300764-300764.
- 40. Telephone conversation record of Mr. D. Brayack, NUS Corporation, and Mr. Kevin Zarovick, Chemical Waste, re: Incineration and treatment of wastes, 3/13/89. P. 300765-300765.
- 41. Letter to Mr. Jeffrey Pike, U.S. EPA, from Ms. Noreen Chamberlain, PADER, re: Confirmation of receipt of the draft Proposed Plan, 3/22/89. P. 300766-300766.
- 42. Report: Final Concentrated Liquids Assessment,
 Whitmoyer Laboratories Site, Lebanon County,
 Pennsylvania, prepared by NUS Corporation, 3/24/89.
 P. 300767-300836.

- 43. Proposed Plan, Superfund Concentrated Liquids Remedial Action, Whitmoyer Laboratories, Site, Lebanon County Pennsylvania, 4/17/89. P. 300837-300845.
- 44. Material Safety Data Sheet for Piperazine 65, prepared by Dow Chemical U.S.A., (undated). P. 300846-300846.
- 45. Chem-Clear Inc., Sample Form for Sample No. 1644 (undated). P. 300847-300849.
- 46. Declaration for the Record of Decision, Whitmoyer Laboratories Site, Jackson Township, Lebanon County, Pennsylvania, 6/30/89. P. 300850-300899.
- 47. Five-Year Review Report, Whitmoyer Laboratories Superfund Site, Jackson Township, Lebanon County, Pennsylvania, prepared by U.S. EPA, 3/24/00. P. 300900-300907.
- 48. Letter to Mr. Matt Yunaska, Rohm and Haas Corporation, from Mr. Christopher Corbett, U.S. EPA, re: Transmittal of second Five-Year Review for Whitmoyer Laboratories Site, 5/9/00. P. 300908-300908.

IV . REMOVAL RESPONSE DOCUMENTS

- 1. Letter to Mr. Jack L. Downie, U.S. EPA, from Mr. David P. Kammer, PADER re: Laboratory and industrial chemicals and Hazardous waste in buildings, storage tanks, and drums, 8/25/88. P. 400001-400001.
- 2. Memorandum to Dr. J. Winston Porter, U.S. EPA, from Mr. James M. Seif, U.S. EPA, re: Justification for Additional Funding Request of CERCLA Removal Funds and Change of Scope of Work, 9/21/88. P. 400002-400009. A memorandum requesting the Ceiling Increase and a Change of Scope of Work is attached.
- 3. Memorandum to Dr. J. Winston Porter, U.S. EPA, from Mr. Stanley L. Laskowski, U.S. EPA, re: Request for an Exemption to the One-Year Statutory Limit and a Change of Scope of Work for Removal Action, 12/16/88.

 P. 400010-400016. The request for approval of exemption to the One-Year Statutory Limit and Change of Scope of Work is attached.
- 4. Letter to Mr. Thomas C. Voltaggio, U.S. EPA, from Ms. Ellen S. Friedell, Rohm and Haas Company, re: Removal of concentrated liquid, 4/27/89. P. 400017-400017.
- 5. Memorandum to Dr. J. Winston Porter, U.S. EPA, from Mr. James M. Seif, U.S. EPA, re: Justification for Approval of a Removal Action, (undated). P. 400018-400024. A memorandum regarding a CERCLA Funding Request is attached.

V. <u>COMMUNITY INVOLVEMENT/CONGRESSIONAL</u> CORRESPONDENCE/IMAGERY

- Geological Survey Map of Flood Prone Areas, 1973.
 P. 500001-500001.
- Geological Survey Map of Flood Prone Areas, 1973.
 P. 500002-500002.
- 3. Flood Insurance Rate Map (FIRM) of Township of Jackson, Pennsylvania, Lebanon County, Map Index and panels 5, 11, 12, 13, 14, (undated). P. 500003-500008.
- 4. Photograph of Tank T-10 Arsenical Wastewater (Tank 4 on the 12/22/82 Preparedness, Prevention, and Contingency Plan Map), 1/7/88. P. 500009-500009.
- 5. Photograph of Methanol and Cellosolve Tanks, 1/7/88. P. 500010-500010.
- 6. Photograph of Tank T-3 mark PCE Aniline (Tank 10 on the 12/22/82 Preparedness, Prevention, and Contingency Plan Map) and Tank marked PCE (Tank 9 on the 12/22/Map), 1/7/88. P. 500011-500011.
- 7. Photograph of Leaking arsenic wastewater tank 1/5/Town on 12/22/82 Preparedness, Prevention and Contingency Plan Map, 1/7/88. P. 500012-500012.
- 8. Photograph of Tanker Truck (marked 725) showing lack of secondary containment, 1/7/88. P. 500013-500013.
- 9. Photograph of Tanker Truck (marked 710) taken to show lack of secondary containment and proximity to Tulpehocken Creek, 12/22/88. P. 500014-500014.
- 10. Photograph of unmarked tanks (Tanks 19 and 20 on the 12/22/82 Preparedness, Prevention, and Contingency Plan Map), 1/7/88. P. 500015-500015.
- 11. Report: <u>Site Analysis, Whit Moyer [sic]</u>
 <u>Laboratories Myerstown, Pennsylvania</u>, prepared by
 U.S. EPA, 8/84. P. 500016-500036.

12. Report: <u>Final Community Relations Plan, Whitmoyer Laboratories Site, Jackson Township, Lebanon County, Pennsylvania</u>, prepared by Ebasco Services Incorporated, 4/17/89. P. 500037-500063.

BIBLIOGRAPHY OF SITE SPECIFIC GUIDANCE DOCUMENTS

- 1. Report: Rexolin Chemicals AB description and classification of Chemical Piperazine 65 (technical grade) prepared by Rexolin Chemicals, 2/1/79.
- 2. Report: <u>U.S. EPA Site Analysis: Whitmoyer</u>
 <u>Laboratories, Myerstown, Pennsylvania</u>, prepared by
 The Bionetics Corporation, 8/84.
- 3. Report: Aniline (A Proposal for Testing Needs to Fill the Data Gap Present in the Literature, prepared by Dr. Raymond S.H. Yang, 12/18/85.
- 4. Report: <u>Toxicological Profile for Arsenic (Draft for Public Comment)</u>, prepared by Agency for Toxic Substances and Disease Registry, 11/87.
- 5. Fact Sheet, re: LARO, 10 FEC-80, PIPERAZINE-34, HYDROL Concentrate, and PANTEK II, prepared by Whitmoyer Laboratories Inc., (undated).
- 6. Fact Sheet, re: TESAN, 10FEC-20, 10FEC-80, PANTEK-II, Clean Hatch, Piperazine-34, Piperazine Dihydrochloride, Arsanilic Acid-100, Ethylenediamine Dihydriodide (EDDI), Whitsyn-S, Tzad, and San-0-FEC-5; prepared by Whitmoyer Laboratories, Kent, and Hess & Clark, Inc., (undated).